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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAY 20 1998

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DIRECTOR OF THE FCC

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
Forward-Looking Mechanism for)	CC Docket No. 97-160
High Support for Non-Rural LECs)	
)	
Comments on High Cost Proposals)	DA 98-715

REPLY OF AMERITECH

Ameritech¹ submits this reply to comments on the Common Carrier Bureau's Public Notice in the above-captioned matter.²

Numerous parties filed comments on the various high cost funding proposals. Many of those parties simply advocate proposals solely on the basis of the economic impact on them particularly, without regard to larger principles. Although comments of this nature contribute to the level of "noise" in the debate, they add very little substance.

In its careful attention to this matter, therefore, the Commission should, of course, keep its eye on the "big picture." As Ameritech noted in its comments, the Chairman's "8 Principles" for universal service provide a solid framework for analyzing the various proposals. Maintaining

¹ Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

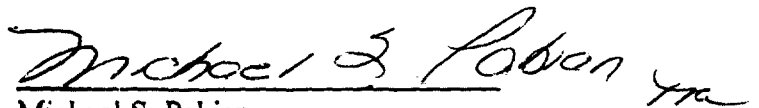
² Public Notice, DA 98-715 (released April 15, 1998).

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support for rural carriers, recognizing the states' role in furthering universal service, ensuring competitive neutrality, and encouraging efficient investment, are all necessary aspects of a universal service funding plan that will not compromise other public policy interests. Again, the Commission's 25% plan, modified to permit rural carriers to continue to recover the interstate high cost support that they receive today (without offsetting reductions to their access charge levels), best fulfills those principles.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael S. Pabian". The signature is fluid and cursive, with a horizontal line drawn underneath the name.

Michael S. Pabian
Counsel for Ameritech
Room 4H82
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025
(847) 248-6044

Dated: May 29, 1998
[MSP0141.doc]

CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of the foregoing Reply of Ameritech has been served on the parties listed on the attached service list, via first class mail, postage prepaid, on this 29th day of May, 1998.

By: Todd H. Bond
Todd H. Bond

RICHARD MCKENNA HQE03J36
ATTORNEY FOR
GTE SERVICE CORPORATION
P O BOX 152092
IRVING TX 75015-2092

GAIL L POLIVY
ATTORNEY FOR
GTE SERVICE CORPORATION
1850 M STREET NW SUITE 1200
WASHINGTON DC 20036

JAY C KEITHLEY
LEON M KESTENBAUM
H RICHARD JUHNKE
ATTORNEYS FOR
SPRINT CORPORATION
1850 M STREET NW SUITE 1100
WASHINGTON DC 20036

CHRIS FRENTROP
SENIOR REGULATORY ANALYST
MCI TELECOMMUNICATIONS CORP
1801 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20036

EMILY M WILLIAMS
ASSOCIATION FOR LOCAL
TELECOMMUNICATIONS SERVICES
1200 19TH STREET NW
WASHINGTON DC 20036

MARY MC DERMOTT
LINDA KENT
CHARLES D COSSON
ATTORNEYS FOR
THE UNITED STATES TELEPHONE ASSOC
1401 H STREET NW SUITE 600
WASHINGTON DC 20005

PAT WOOD III
ROBERT W GEE
JUDY WALSH
PUBLIC UTILITY COMMISSION OF TEXAS
1701N CONGRESS AVE
AUSTIN TX 78711-3326

ROBERT MC KENNA
KATHRYN MARIE KRAUSE
ATTORNEY FOR
US WEST INC
SUITE 700
1020 19TH STREET NW
WASHINGTON DC 20036

RICHARD M SBARATTA REBECCA LOUGH
M ROBERT SUTHERLAND
ATTYS FOR BELL SOUTH CORPORATION
BELL SOUTH TELECOMMUNICATIONS
INC
1155 PEACHTREE STREET NE STE 1700
ALTANTA GA 30309-3610

PETER ARTH JR EDWARD W O'NEILL
MARY MACK ADU
ATTORNEYS FOR
THE PEOPLE OF THE STATE OF
CA/THE PUC OF THE STATE OF
CALIFORNIA
505 VAN NESS AVE
SAN FRANCISCO CA 94102

DAVID KAUFMAN ESQ
NEW MEXICO STATE CORPORATION
COMMISSION
P O BOX 1269
SANTA FE NM 87504-1269

RONALD J BINZ PRESIDENT
DEBRA R BERLYN EXECUTIVE
DIRECTOR
JOHN WINDHAUSEN JR GEN
COUNSEL
COMPETITION POLICY INSTITUTE
1156 15TH STREET NW SUITE 310
WASHINGTON DC 20005

JEFFREY F BECK
JILLISA BRONFMAN
ATTORNEYS FOR
EVANS TELEPHONE COMPANY ET AL
FOUR EMBARCADERO CENTER
SAN FRANCISCO CA 94111

EMILY C HEWITT
VINCENT L CRIVELLA
JODY BURTON
GENERAL SERVICES ADMINISTRATION
18TH & F STREETS NW ROOM 4002
WASHINGTON DC 20405

SAMUEL LOUDENSLAGER
ARKANSAS PUBLIC SERVICE COMMISSION
P O BOX 400
LITTLE ROCK AR 72203-0400

LAWRENCE W KATZ
ATTORNEY FOR
THE BELL ATLANTIC TELEPHONE CO
EIGHTH FLOOR
1320 NORTH COURT HOUSE ROAD
ARLINGTON VA 22201

JOEL B SHIFMAN ESQ
MAINE PUBLIC UTILITIES COMMISSION
STATE HOUSE STATION NO 18
242 STATE STREET
AUGUSTA ME 04333-0018

MARK C ROSENBLUM
PETER H JACOBY
JUDY SELL
ATTORNEYS FOR AT&T
ROOM 3244J1
295 NORTH MAPLE AVENUE
BASKING RIDGE NJ 07920

THE HONORABLE LASKA
SCHOENFELDER COMMISSIONER
SOUTH DAKOTA PUBLIC UTILITIES
COMMISSION STATE CAPITOL
500 EAST CAPITOL STREET
PIERRE SD 57501-5070

STEVEN HAMULA ESQ
PUBLIC SERVICE COMMISSION OF
WEST VIRGINIA
P O BOX 812
201 BROOKS STREET
CHARLESTON WV 25323

ANN DEAN
MARYLAND PUBLIC SERVICE
COMMISSION
16TH FLOOR 6 SAINT PAUL STREET
BALTIMORE MD 212020-6806

KATHRYN M BAILEY
NEW HAMPSHIRE PUBLIC UTILITIES
COMMISSION
8 OLD SUNCOOK ROAD
CONCORD NH 03301-7319

SANDRA MAKEEFF
IOWA UTILITIES BOARD
LUCAS STATE OFFICE BUILDING
DES MOINES IA 50319

JOE D EDGE
RICHARD J ARSENAULT
ATTORNEYS FOR
PUERTO RICO TELEPHONE COMPANY
901 FIFTEENTH STREET NW
WASHINGTON DC 20005

ROWLAND CURRY
TEXAS PUBLIC UTILITY COMMISSION
1701 NORTH CONGRESS AVENUE
P. O. BOX 13326
AUSTIN TX 78701

RICHARD A ASKOFF
ATTORNEY FOR
NATIONAL EXCHANGE CARRIER ASSOC
100 SOUTH JEFFERSON ROAD
WHIPPANY NJ 07981

THE HONORABLE PATRICK H WOOD III
COMMISSIONER
TEXAS PUBLIC UTILITY COMMISSION
1701 NORTH CONGRESS AVE
AUSTIN TX 78701

DAVID L SHARP
CEO
PRESIDENT
VIRGIN ISLANDS TELEPHONE CORP
P O BOX 6100
ST THOMAS US VIRGIN ISLANDS 00801

BENJAMIN H DICKENS JR
GERARD J DUFFY
COUNSEL FOR THE WESTERN ALLIANCE
2120 L STREET NW
WASHINGTON DC 20037

MARGOT SMILEY HUMPHREY
ATTORNEY FOR
THE RURAL TELEPHONE COALITION
1150 CONNECTICUT AVE NW SUITE 1000
WASHINGTON DC 20036

KATHRYN M BAILEY
NEW HAMPSHIRE PUBLIC UTILITIES
COMMISSION
8 OLD SUNCOOK ROAD
CONCORD NH 03301-7319

KAREN FINSTAD HAMMEL
STAFF ATTORNEY
MONTANA PUBLIC SERVICE
COMMISSION
1701 PROSPECT AVENUE
P O BOX 202601
HELENA MT 59601-2601

MAUREEN O HELMER
GENERAL COUNSEL
NEW YORK STATE DEPARTMENT OF
PUBLIC SERVICE
THREE EMPIRE STATE PLAZA
ALBANY NY 12223-2510

DEBRA M KRIETE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION
P O BOX 3265
HARRISBURG PA 17105-3265

ROBERT M LYNCH DURWARD D DUPRE
MICHAEL J ZPEVAK
DARRYL W HOWARD
ATTORNEYS FOR
SOUTHWESTERN BELL TELEPHONE CO
ONE BELL CENTER SUITE 3524
ST LOUIS MO 63101

JAMES D ELLIS
ROBERT M LYNCH
DAVID F BROWN
ATTORNEYS FOR
SBC COMMUNICATIONS INC
175 E HOUSTON ROOM 1254
SAN ANTONIO TX 78205

MICHAEL S FOX
DIRECTOR REGULATORY AFFAIRS
JOHN STAURULAKIS INC
6315 SEABROOK ROAD
SEABROOK MD 20706

MARGOT SMILEY HUMPHREY
ATTORNEY FOR
AND TDS TELECOMMUNICATIONS CO
SUITE 1000
1150 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

MARC A STONE
MANAGER REGULATORY/LEGISLATIVE
AFFAIRS
FRED WILLIAMSON & ASSOCIATES
2921 EAST 91ST STREET SUITE 200
TULSA OK 74137-3300

FREDERICK M JOYCE
ATTORNEY FOR
CELPAGE INC
14TH FLOOR PH-2
1019 19TH STREET NW
WASHINGTON DC 20036

RICHARD M TETTELBAUM
ASSOCIATE GENERAL COUNSEL
CITIZENS UTILITIES COUNSEL
1400 16TH STREET NW SUITE 500
WASHINGTON DC 20036

GENEVIEVE MORELLI
VP AND GENERAL COUNSEL
THE COMPETITIVE
TELECOMMUNICATIONS ASSOCIATION
1140 CONNECTICUT AVE NW SUITE 220
WASHINGTON DC 20036

DAVID A IRWIN
ATTORNEY FOR
ITCs INC
1730 RHODE ISLAND AVENUE NW
WASHINGTON DC 20036

GARY WALSH
P O BOX 11649
COLUMBIA SC 29203

STEVEN T NOURSE
ASSISTANT ATTORNEY GENERAL
PUBLIC UTILITIES COMMISSION OF OHIO
180 EAST BROAD STREET
COLUMBUS OH 43215-3793

MARIA TANKENSON HODGE
LEGAL COUNSEL FOR
THE VIRGIN ISLANDS PUBLIC SERVICES
COMMISSION
1340 TAARNEBERG
ST THOMAS VI 00802

MITCHELL F BRECHER
ROBERT E STUP JR
ATTORNEYS FOR
OPERATOR COMMUNICATIONS INC
1400 SIXTEENTH STREET NW
WASHINGTON DC 20036

ARNALDO A MIGNUCCI-GIANNONI
THE ASSOCIATION OF COMPETITIVE
TELECOMMUNICATIONS PROVIDERS
33 BOLIVIA STREET SUITE 530
HATO REY PURETO RICO 00917

KATHY D SMITH
ACTING CHIEF COUNSEL
UNITED STATES DEPARTMENT OF
COMMERCE
NATIONAL TELECOMMUNICATIONS AND
INFORMATION ADMINISTRATION
WASHINGTON DC 20230